REMARKS

I. Office Action Summary

Claims 1-16 are currently pending. Claims 1, 5 and 12 are the independent claims. In the Office Action dated February 25, 2004, the Examiner rejected all of the claims. Claim 14 was rejected as indefinite under 35 U.S.C. § 112, second paragraph. Claims 1, 5-7 and 9-16 were rejected as anticipated by Edelstein et al. (U.S. 5,764,906) under 35 U.S.C. § 102(b). Claims 2-4 were rejected as obvious over Edelstein in combination with Call (U.S. 6,418,441) and claim 8 was rejected as obvious over the combination of Edelstein and "official notice".

II. Rejections Under 35 U.S.C. § 112, Second Paragraph

Applicant agrees with the Examiner that the phrase "the second client entity" in claim 14 should instead read "the client entity". Applicant has amended claim 14 to reflect this correction.

III. Rejections Under 35 U.S.C. § 102(b)

Claims 1, 5-7 and 9-16 were rejected as anticipated by Edelstein. Applicant has amended claim 1, 5 and 12 and respectfully traverses the rejection.

CLAIM 1

Claim 1 recites a transfer protocol. Specifically, claim 1 recites a network distributed tracking wire transfer protocol that defines certain message formats that permit extremely efficient management of data through the management of the location information regarding that data. As amended, the transfer protocol of claim 1 includes, *inter alia*,

> a redirect message formatted to transport redirection information, the redirection information comprising information for determining a location of location information associated with the entity specified in the identification string;
>
> wherein the protocol supports a machine-independent relationship between the identification string and the location string.

Amended claim 1 recites a redirect message format that transports redirection information. The redirect message provides information for determining a location of location of information relating to an entity specified in the identification string. Support for this feature may be found throughout the specification, as for example at pages 23-27 and FIGS. 9(a) and 9(b).

One example of the redirect function supported by the transfer protocol of claim 1 is seen in FIGS. 11-12 and described in the specification at page 28, line 21 to page 30, line 18. Using messages formatted according to the claimed transfer protocol, a client sends a request to a server for the location of information relating to a particular entity. If the server does not have the location of information relating to the entity identified in the identifier string, it returns a redirect message to the client. The redirect message contains information for determining location of the location information. The client can then query the location determined from the redirect message (in the example of FIG. 12, NDTP Server1), and retrieve the location data associated with the entity of interest. Using this retrieved location information, the client can then access data relating to the entity by communicating with the location(s) identified in NDTP Server1 as containing data relating to the entity of interest. This is one of many permutations of data management schemes supported by the transfer protocol recited in claim 1.

The Edelstein reference, unlike claim 1, does not describe a transfer protocol. Instead, Edelstein recites an application for managing aliases and nicknames for a specific address. Rather than describing a transfer protocol that might be able to efficiently accomplish the tasks recited in Edelstein, Edelstein appears to assume that the application can be carried out somehow using whatever existing protocol is available. The portions of Edelstein's disclosure cited by the Examiner relate to a specific, fixed, device-dependent hierarchy where nicknames and aliases for a particular address are searched up the predetermined device hierarchy. The address information, once the relationship between alias/nickname and the desired address has been discovered, is then replicated at the local server level to reduce future search time, thus slowing down processing performance in proportion to the number of devices and system complexity of the system using the Edelstein approach. The transfer protocol of

claim 1 addresses such limitations and provides predictable performance regardless of system complexity.

For example, Edelstein fails to teach or suggest a redirect message format as recited in claim 1. Edelstein mechanically checks each and every server in the predetermined hierarchy rather than providing a current location of the sought after location information to the inquiring client. As recited in claim 1, the redirect message provides "information for determining a location of location information . . ." so that a client may bypass any machine-dependent hierarchy to more directly access the desired location information. Accordingly, for at least these reasons, Applicant submits that claim 1 is allowable over the cited art. Claims 2-4 and 17-18 are dependent claims, therefore their allowability directly follows from the allowability of independent claim 1.

Although Applicant notes that the dependent claims to claim 1 are allowable for at least the same reasons as provided for claim 1, Applicant has added claims 17 and 18 to further clarify aspects of the redirect mechanism. New claim 17 relates to one embodiment of the redirect mechanism where information carried in the redirect message is a table of information for the recipient of that table to process using a predetermined function in order to determine where next to look for location of location data. New claim 18 recites another version of the information carried by the redirect message where a function is passed as part of the message. Support for these claims may be found, for example, at page 24, line 13 – page 26, line 9 in the specification.

CLAIM 5

Amended claim 5 relates to a system having a network distributed tracking wire transfer protocol for storing and identifying data with a distributed data collection. The system includes, *inter alia,* a first server entity responsive to a client request to provide a redirection message to the first client entity if the first server entity cannot provide at least one location string to the client entity. As discussed above with respect to claim 1, Edelstein defines a device hierarchy dependent application that fails to teach or suggest any redirection mechanism that is communicated to the client or other servers. Accordingly, for at least these reasons, Applicant respectfully submits that claim 5 is

allowable over the cited art. Claims 6-9 and 19-20 are dependent claims, therefore their allowability directly follows from the allowability of independent claim 5.

Although Applicant notes that the dependent claims to claim 5 are allowable for at least the same reasons as provided for claim 5, Applicant has amended (or added) these claims to further clarify aspects of the claimed system. Support for the amendments to claims 6-9 and added claims 19 and 20 may be found throughout the specification as at, for example, page 24, line 13 – page 25, line 9; page 29, lines 20-31 and FIGS. 11-13.

CLAIM 12

Amended claim 12 relates to a method for storing and retrieving tracking information over a network using a wire transfer protocol. The method includes the step of a server entity responding to the client entity with a redirect message if an appropriate location string is not found at the first server entity. For at least the same reasons as discussed above with claims 1 and 5, Applicant submits that Edelstein lacks any teaching or suggestion of the features of claim 12. Claims 13-16 and 21-23 are dependent claims, therefore their allowability directly follows from the allowability of independent claim 12.

Although Applicant notes that the dependent claims to claim 12 are allowable for at least the same reasons as provided for claim 12, Applicant has amended (or added) these claims to further clarify aspects of the claimed method. Support for the amendments to claims 13-16 and added claims 21-23 may be found throughout the specification as at, for example, page 24, line 13 – page 25, line 9; page 29, lines 20-31 and FIGS. 11-13.

III. Rejections Under 35 U.S.C. § 103(a)

Applicant respectfully disagrees with the Examiner's rejections of dependent claims 2-4 and 8. Applicant notes that claims 2-4 and 8, in addition to each reciting features that distinguish over the cited references, depend from amended independent claims 1 and 5, respectively. Accordingly, claims 2-4 and 8 are allowable for at least the same reasons as their respective independent claims.

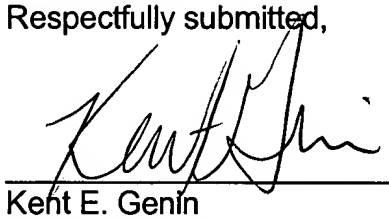
IV. Previously Submitted Information Disclosure Statements

Applicant notes that the PTO-1449 forms for two timely submitted information disclosure statements were not attached to the February 25, 2004, Office Action. Applicant has attached copies of the information disclosure statements (one mailed Oct. 26, 2000 and stamped received on Oct. 30, 2000; the other mailed Dec. 4, 2000 and stamped received Dec. 8, 2000) , including the associated PTO-1449's, along with their respective transmittal letters and return postcards (stamped received). Applicant requests that the Examiner review the previously provided references and sign and return the attached PTO-1449's.

V. Conclusion

Applicant has amended claims 1, 5-9, 12-14, canceled dependent claims 10-11, and added dependent claims 17-23. In light of the above remarks and amendments, Applicant submits that claims 1-9 and 12-23 are now in condition for allowance. If any issues arise or questions remain, the Examiner is invited to contact the undersigned at the number listed below in order to expedite disposition of this case.

Respectfully submitted,



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